

III. REMARKS

1. Claims 1-12 remain in the application. Claim 13 is new. Claims 1, 4-6, 8, 9, and 11 have been amended.
2. Applicants respectfully submit that claims 1, 5-9, 11, and 12 are patentable over the combination of Green (WO 98/10571 in view of Sudo et al. (US 5,999,827, "Sudo") and Petrella et al. (US 5,745,566, "Petrella") under 35 USC 103(a).

The combination of Green, Sudo, and Petrella fails to disclose or suggest:

a user interface, including at least a first keypad and a display, wherein a portion of the user interface is arranged to be replaceable by placing a replacement cover in a detachable manner in connection with the housing, wherein the second part is adapted to be removed before inserting the replacement cover in place of the second part, and that said replacement cover includes at least keys for applications and changing the functionality of the first keypad, as recited by claim 1.

The combination of Green, Sudo, and Petrella fails to disclose or suggest:

changing the user interface by removing the second part and placing a replacement cover in a detachable manner in connection with the housing and in place of the second part, and

equipping the replacement cover with at least means for providing keys for applications and changing the functionality of the first keypad, as recited by claim 9.

- 2.1 Green fails to disclose or suggest replaceable user interface functions. In Green, a keypad adaptor is mounted on a conventional keypad of a phone that includes keys which are preferably larger and more spaced apart than the keys of the conventional keypad. A portion of the user interface that includes a first keypad and a display, as

recited by the present claims is not replaced, the adapter is simply mounted over the original keypad.

The Office Action correctly points out that Green also fails to disclose or suggest a replacement cover that includes at least means for providing keys for applications and changing the functionality of the keys. Applicants submit that Green also fails to disclose or suggest a replacement cover that includes at least keys for applications and changing the functionality of the first keypad, as now stated by claims 1 and 9.

The Office Action also correctly points out that Green fails to disclose or suggest a second part of the housing adapted to be removed before inserting a replacement cover in place of the second part.

2.2 Sudo, like Green, fails to disclose or suggest replaceable user interface functions as defined by the present claims.

Sudo further fails to disclose or suggest a replacement cover that includes at least keys for applications and changing the functionality of the first keypad, as now stated by claims 1 and 9. Sudo discloses a communication terminal with a normal keypad and soft keys. The functions of the soft keys are changed by a scroll knob and the soft key functions are displayed on a region of a display. There is no replacement cover in Sudo, nor any keys that change the functionality of a first keypad. The soft keys 1, 2, 3 of Sudo have no relationship with any keys of the keypad 5.

Sudo also has no disclosure related to a second part of the housing adapted to be removed before inserting a replacement cover in place of the second part.

2.3 Petrella, similar to Green and Sudo, fails to disclose or suggest replaceable user interface functions as defined by the present claims.

Petrella also fails to disclose or suggest a replacement cover that includes at least keys for applications and changing the functionality of the first keypad, as now stated by claims 1 and 9.

Contrary to the rejection in the present Office Action, Applicants respectfully submit that Petrella also fails to disclose or suggest a second part of the housing adapted to be removed before inserting the replacement cover in place of the second part. The present claims clearly define the replacement cover as including at least keys for applications and changing the functionality of the first keypad. The escutcheon of Petrella is only able to be replaced by another escutcheon and is not able to be replaced by a cover that provides keys.

At least for these reasons, Applicants submit that the combination of Green, Sudo, and Petrella fails to disclose all the features of independent claims 1 and 9, and dependent claims 5-8, 11 and 12. Therefore, these claims are patentable over the combination of Green, Sudo, and Petrella.

3. Applicants respectfully submit that claims 2-4, and 10 are patentable over the combination of Green and Sudo, further in view of Fuhrmann et al. (WO 97/32423, "Fuhrmann").

Claims 2-4 and 10 depend from claims 1 or 9.

Fuhrmann fails to supply the features missing from the combination of Green and Sudo argued above.

Fuhrmann only relates to replacing a cover with a different cover while the functions remain the same. Fuhrmann only discloses a cover that has an opening for a display and for keys but has no display or keys itself.

Thus, the combination of Green, Sudo and Fuhrmann fails to disclose or suggest means for providing user interface functions, including at least a first keypad and a display, wherein a portion of the user interface is arranged to be replaceable by placing a replacement cover in a detachable manner in connection with the housing, wherein the second part is adapted to be removed before inserting the replacement cover in place of the second part, and that said replacement cover includes at least keys for applications and changing the functionality of the first keypad, as recited by claim 1.

The combination of Green, Sudo and Fuhrmann fails to disclose or suggest changing the user interface by removing the second part and placing a replacement cover in a detachable manner in connection with the housing and in place of the second part, and equipping the replacement cover with at least means for providing keys for applications and changing the functionality of the first keypad, as recited by claim 9.

At least for these reasons, claims 2-4, and 10 are patentable over the combination of Green, Sudo and Fuhrmann.

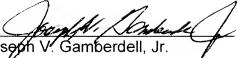
4. Claim 13 is new and is directed to a communication device including at least a housing having at least a first part and a second part, and means for providing user interface functions, including at least a first keypad and a display, wherein a portion of the user interface functions are arranged to be replaceable by placing a replacement cover in a detachable manner in connection with the housing, wherein the second part is adapted to be removed before inserting the replacement cover in place of the second part, and that said replacement cover includes at least means for providing keys for applications and changing the functionality of the first keypad.

Claim 13 is patentable over the cited references for all the reasons argued in support of claim 1 above.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,


Joseph V. Gamberdell, Jr.
Reg. No. 44,695

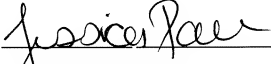
19 September 2006
Date

Perman & Green, LLP
425 Post Road
Fairfield, CT 06824
(203) 259-1800
Customer No.: 2512

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that this correspondence is being deposited transmitted electronically, on the date indicated below, addressed to the Mail Stop AMENDMENT, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

Date: 9.19.2006

Signature: 
Person Making Deposit